

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RADIO MUSIC LICENSE COMMITTEE,  
INC.,

Plaintiff,

v.

GLOBAL MUSIC RIGHTS, LLC,

Defendant.

Civil Action No. 16-6076

Judge: Hon. C. Darnell Jones II

**DEFENDANT GLOBAL MUSIC RIGHTS, LLC'S MOTION TO DISMISS OR  
TO TRANSFER VENUE**

Pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6), Defendant Global Music Rights, LLC ("GMR") hereby moves the Court for an order dismissing the Complaint of Plaintiff Radio Music License Committee, Inc. ("RMLC") for lack of personal jurisdiction, for improper venue, and for failure to state a claim upon which relief can be granted. In the alternative, pursuant to 28 U.S.C. § 1404(a), GMR moves to transfer this lawsuit to the Central District of California.

GMR requests that this Court dismiss the Complaint, or in the alternative, transfer this lawsuit to the Central District of California. In support of this motion, GMR submits the concurrently filed (i) Memorandum Of Law In Support Of Defendant's Motion To Dismiss Or To Transfer Venue, (ii) Declaration Of Randy Grimmett In Support Of Defendant's Motion To Dismiss Or To Transfer Venue, (iii) Declaration Of David Marroso In Support Of Defendant's Motion To Dismiss Or To Transfer Venue, and (iv) Proposed Order.

Dated: January 20, 2017

Respectfully submitted,

By: /s/ David Marroso

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